

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ANGEL DAVID MORALES-VALLELLANES

Plaintiff

v.

UNITES STATES POSTAL SERVICE

Defendant

CIVIL NO. 97-2459 (CVR)

MOTION FOR EXTENSION

TO THE HONORABLE COURT:

COMES NOW the defendant through the undersigned to respectfully state, allege and pray:

1. On December 21, 2007 the jury entered a verdict for \$500,000.00, later reduced to \$300,000.00 pursuant to 42 U.S.C. 1981a. **(D.E. 405)**

2. Initially, the Court had granted plaintiff until January 31, 2008 within which to file his petition for back and front pay and defendant until February 11, 2008 to file any opposition thereto. **(D.E. 403)**

3. Pursuant to plaintiff's Motion for Extension at **D.E. 407** the Court granted him until February 11, 2008 within which to address any back and front pay issues. **(D.E. 408)**

4. The defendant respectfully requests an extension until March 7, 2008 within which to file his opposition to any back and front pay petition from the plaintiff and to initially address the Court as to why the jury verdict for \$500,000.00 (reduced to

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\$300,000.00) should be set aside, without waiving any post-judgment motion under F.R.C.P. 50 and F.R.C.P. 59, respectively. If the Court denies defendant's petition to address the setting aside of the jury verdict until after judgment is entered, then the defendant respectfully petitions until February 29, 2008 within which to file his opposition to plaintiff's back and front pay remedies.

WHEREFORE, the defendant respectfully requests from this Honorable Court that it grant until March 7, 2008 within which to address back and front pay issues as well as to the setting aside of the jury verdict or until February 29, 2008 to file his opposition to plaintiff's motion for back and front pay.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Miguel Miranda, Esq.

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RESPECTFULLY SUBMITTED in San Juan, Puerto Rico this 1st day
of February, 2008.

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